

Quality Management Plan

Avery Landing Site
Avery, Idaho

for

**U.S. Environmental Protection Agency on Behalf
of Potlatch Land and Lumber, LLC**

April 12, 2013



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Quality Management Plan
Avery Landing Site
Avery, Idaho
File No. 2315-016-02
April 12, 2013

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ATTACHMENTS

Attachment A.1. Resumes

RECORD OF AMENDMENTS

Revision	Author	Date	Comments
<u>1</u>	<u>Robert Trahan</u>	<u>4/8/2013</u>	<u>Updated in response to EPA review comments.</u> <u>Updated document date, personnel on</u> <u>approvals page and references listed in</u> <u>Section 12.0.</u>

1.0 INTRODUCTION

This Quality Management Plan (QMP) documents GeoEngineers quality system for planning, implementing, documenting, and assessing the effectiveness of activities to support environmental activities for the removal action being performed by the Potlatch Land and Lumber, LLC (Potlatch) at the Avery Landing Site (Site) located in Avery, Idaho. Environmental activities include implementation of an Environmental Protection Agency (EPA) directed removal action, review of data results and interpretation of chemical and/or physical measurements relating to the environment. Implementing a comprehensive QMP is necessary to ensure that accurate environmental data are available to support the decision process. GeoEngineers, Inc. (GeoEngineers) is committed to quality assurance (QA) and quality control (QC) practices, and incorporating them into environmental studies and activities. These practices enable GeoEngineers to generate accurate data in a cost-effective manner.

This QMP has been prepared to meet EPA requirements, described in document QA/R-2, EPA Requirements for Quality Management Plans dated March 2001 (EPA, 2001). EPA requirements are based on the national consensus standard, ANSI/ASQ E4-2004, Quality Systems for Environmental Data and Technology Programs – Requirements with Guidance for Use (ANSI/ASQ, 2004). This QMP outlines the guidelines and practices that lead to effective planning and execution of environmental studies, and describes procedures for reporting QA/QC activities. It applies to the work performed by GeoEngineers that involves acquiring environmental data generated from direct measurement activities or from existing data (i.e., collected from other sources, or compiled from computerized databases and information systems).

1.1. MISSION STATEMENT AND CORE VALUES

GeoEngineers operates on the fundamentals defined by our purpose, overarching goals and core values. The fundamentals are defined as followed.

1.1.1. Purpose

We Find a Better Way to apply the earth science and technology to improve the world we live in.

1.1.1.1. OVERARCHING GOALS

- A Reputation of Excellence: Where our name connotes the standard of technical and professional excellence in our areas of practice.
- Growth through Leadership: Where we lead to expand opportunities for ourselves and our clients throughout the world.

1.1.1.2. CORE VALUES

- We think **safety** first.
- We deliver **unparalleled service** to our clients.
- We demonstrate **absolute integrity** in all we do.
- We achieve **technical excellence** in our operations and work products.
- Internal and external **teamwork** is essential for the success of our clients and our company.

- **Caring and respect** define our culture.
- We are committed to **broad, internal ownership** of GeoEngineers.
- Our **profitability** generates attractive financial rewards for our shareholders and our employees.
- We seek and **embrace opportunity** for our staff and our company.

1.2. ETHICS POLICY

GeoEngineers is committed to conducting business in an honest and ethical manner. The centerpiece of our core values is demonstrating absolute integrity in all that GeoEngineers does. This is communicated to every new employee, is a component of annual performance reviews and is carefully monitored by our executive management team. To a great extent, GeoEngineers relies on the individual behavior and choices of each employee. Therefore, great care is taken to hire and retain individuals that recognize and have demonstrated ethical practice. Every person employed by GeoEngineers is expected to follow all applicable laws, regulations and company policies that govern his or her work. However, their responsibility to ethical practice goes beyond that. Employees are also the company's eyes and ears. Asking questions and raising concerns when an employee is unsure if something is not right is vital to maintaining our integrity.

GeoEngineers ethics policy is intended to inform our employees, Board members, and third parties of the way GeoEngineers and its subsidiaries are expected to conduct business. When employees have any ethical question, they are expected to seek advice from their supervisor, a Principal Business Unit Leader and/or Human Resources. The raising of ethical concerns is encouraged at GeoEngineers. This requires the commitment and dedication of every employee. Employees are expected to follow the letter and spirit of:

- Company guidance and policy;
- Applicable international, federal, state and local laws/regulations; and
- Integrity, honesty and fairness.

1.3. COMMITMENT TO QUALITY

GeoEngineers' core values include providing unparalleled service to our clients, demonstrating absolute integrity in all we do and achieving technical excellence in our operations and work products. In order to establish and enhance our reputation as the leading provider of consulting and engineering services, we are committed to satisfying our clients' expectations for quality and meeting the statutory and regulatory requirements applicable to our work. GeoEngineers is continually seeking to improve the effectiveness of our Quality Management System (QMS). GeoEngineers compares our QMS against the best management practices employed within our profession. We:

- Strive to continually improve the level of satisfaction that our clients experience with the quality of our services and work products;
- Strive to ensure that our technical competencies, quality management practices, and QMS remain appropriate for the types of services and work products that we provide our clients;

- Comply with applicable legal and ethical requirements, safety requirements, and financial management requirements, as well as the quality requirements mutually agreed upon with our clients or established within our corporate operational practices;
- Provide the budgetary support and resources necessary to effectively implement and continually refine our QMS; and
- Periodically evaluate the quality of our professional performance and the effectiveness of our QMS, and based on such evaluations, establish and update reasonable, relevant, achievable, and economically feasible objectives for improvement.

2.0 PROJECT MANAGEMENT AND ORGANIZATION

In general, the achievement of required levels of quality in the services and work products offered is the shared responsibility of the technical staff performing the work. The project organization facilitates the efficient production of project work, allows for an independent quality review, and permits resolution of any QA issues. Descriptions of the responsibilities, lines of authority and communication for the key positions providing QA and QC for the Avery Landing Site Removal Action summarized in the Quality Assurance Project Plan (QAPP) presented in Appendix C off the Avery Landing Removal Action Work Plan (Work Plan; GeoEngineers, 2013). Qualifications of key individuals with GeoEngineers for the Avery Landing Removal Action project are included in Attachment A.

3.0 QUALITY SYSTEM COMPONENTS

GeoEngineers quality system is comprised of multiple elements to ensure that the services and deliverable work products provided by GeoEngineers meet or exceed expectations for quality, and address all applicable contractual and regulatory requirements, within the boundaries of established, technically defensible engineering practices. The principal elements of GeoEngineers quality system include:

- **Management Review** – Periodic reviews are conducted to ensure the continued suitability, adequacy, and effectiveness of the QA program.
- **Contracts and Proposals** – Contracts and proposals are reviewed for negotiating appropriate scopes of work and contractual terms and conditions for awarded projects or task orders.
- **Independent Technical Review** – Independent technical reviews of technical reports and other deliverable project documents are completed to ensure accuracy and precision of the work product.
- **Preparation, Review, Approval, and Update of Quality and Technical Procedures** – The preparation, review, approval, and update of GeoEngineers quality and technical procedures is completed, as appropriate, to ensure the continued suitability, adequacy, and effectiveness of the QA program.
- **Design Control** – Design control is managed to ensure the continued suitability, adequacy, and quality of design work products (e.g., engineering drawings, specifications, or sketches).

- **Field and Subcontractor Inspection** – Inspections of field, laboratory, or office activities are conducted periodically for projects conducted by GeoEngineers.
- **Calibration, Control and Maintenance of Measuring and Test Equipment** – GeoEngineers-owned measuring and test equipment used in field and laboratory investigations is calibrated, controlled, and maintained in general accordance with the manufacture's recommendations.
- **Corrective and Preventive Action** – Corrective and preventive action is initiated by GeoEngineers in response to externally or internally reported non-conformances.
- **Training** – GeoEngineers personnel receive relevant and appropriate levels of training to support the completion of their project assignments.

In addition to the quality system elements listed above, project-specific plans are developed to ensure a high level of services and deliverable work product. Project-specific plans include:

- **Work Plan** –The work plan describes the overall project and provides details on the specific project tasks that will be completed.
- **Site Specific Sampling Plan (SSSP)** – The SSSPs serves as the primary guide for operating procedures for field work to be performed.
- **Quality Assurance Project Plan (QAPP)** – The QAPP presents the objectives, procedures, organization, and specific quality assurance and quality control activities designed to achieve data quality goals established for the project. Environmental measurements will be conducted to produce data that are scientifically valid, of known and acceptable quality and that meet established objectives. QA/QC procedures will be implemented so that the precision, accuracy, representativeness, completeness and comparability of the data generated meet the specified data quality objectives.
- **Health and Safety Plans (HASp)** – This plan is to be used by GeoEngineers personnel if the field work entails potential exposures to contaminants or unusual situations. All plans are to be used in conjunction with current standards and policies outlined in the GeoEngineers Health and Safety Program Manual.

Project decisions, conclusions, and recommendations resulting from environmental data collection will be based upon verified (validated) data. The purpose of data verification is to ensure that data used for subsequent evaluations and calculations are scientifically valid, of known and documented quality, and legally defensible. Field data verification will be used to eliminate data not collected or documented. Laboratory data verification will be used to eliminate data not obtained using prescribed laboratory procedures. The QA Leader will validate data collected from the field investigation to ensure that the data are valid and usable. The data quality assessment will help to achieve an acceptable level of confidence in the decisions that are to be made based upon the project data. Data will be validated in general conformance with EPA functional guidelines for data validation (EPA, [20042008, 2009](#) and [201009](#)). The results of the data quality assessment will be documented in a written report prepared to document the overall quality of the data relative to the data quality objectives defined by the QAPP.

4.0 PERSONNEL QUALIFICATION AND TRAINING

GeoEngineers integrates a suite of services for managing the earth's resources. Since our founding in 1980, GeoEngineers has successfully completed more than 30,000 projects worldwide for clients in the Energy, Transportation, Water and Natural Resources, Development and Federal markets. Our specific capabilities include:

- **Environmental Site Assessment and Remediation** – Site assessments and characterization, feasibility studies, risk assessments, remediation and cleanups.
- **Geotechnical** – Site selection, foundations, ground stabilization, erosion control, geophysical investigation, seismic analyses, numerical modeling, special inspection and testing and construction monitoring.
- **Geologic** – Coastal, fluvial, and upland geomorphology, geologic hazards, critical area ordinances, sand and gravel mine evaluations and forest practice applications.
- **Water Resources** – Groundwater, water supply, water rights, watershed, hydrogeology, water quality, wellhead protection, storm water, aquifer analysis, dewatering and modeling.
- **River and Stream Management** – Hydrology, bank stabilization, engineered logjams, channel migration and sediment transport.
- **Ecological** – Fisheries science, wetlands delineation and mitigation, wildlife, nearshore, marine, habitat restoration, riparian corridors, subtidal habitat and river engineering evaluations.
- **Permitting** – Endangered Species Act, Clean Water Act, National Environmental Policy Act, State Environmental Policy Act and other regulatory issues.
- **Planning** – Land use, geologic hazard reduction, siting studies and regulatory interpretation.
- **Geospatial and GIS** – Data collection, analyses, map integration and remote sensing (including LiDAR terrain modeling).

GeoEngineers staff maintains the necessary certifications and registrations required for the projects we work on, including professional engineers, licensed geologists and engineering geologists, a certified fisheries professional, certified floodplain managers, and professional wetland scientists. All GeoEngineers professionals in the principal, associate, senior and engineer/scientist 2 labor categories must be registered in their field of practice, if registration is available, in the State in which the individual practices. All professionals, regardless of professional level, are encouraged to become registered as soon as possible after meeting the eligibility requirements.

All GeoEngineers employees partake in an annual review process. A portion of the review process is aimed at ensuring the employee maintains the requirements and exceeds the minimum level of expertise for the license(s) they possess. The annual review process includes: 1) documenting employee's needs to maintain professional license(s), certification(s), accreditation(s) or other obligations; 2) identifying the needs of the employee to maintain the requirements of the professional license(s), certification(s), accreditation(s) or other obligations; 3) ensuring that the

employee has the required training to maintain the professional license(s), certification(s), accreditation(s) or other obligations.

GeoEngineers places a strong emphasis on helping all staff develop the skills and understanding of the systems needed to effectively manage complex projects involving multiple technical disciplines and/or office locations. Each of our technical staff participated in a Skills, Experience, Excellence Development (SEED) training course when they arrive at GeoEngineers, and safety training courses. GeoEngineers staff undergoes training by our Health and Safety Manager to ensure each task and activity with safety in mind.

5.0 PROCUREMENT OF ITEMS AND SERVICES

GeoEngineers subcontracts with analytical laboratories that are compliant with our prime contract terms to perform chemical analysis of environmental samples collected. Analytical laboratories comply with Standard Operating Procedures (SOPs) to provide legally defensible analytical data that meet project and regulatory requirements. Laboratories that will be used are accredited for the specific analysis being requested. As needed, subcontracted laboratories contract with other laboratories to perform analyses that they are unable to perform. Data from analyses performed are reviewed by the subcontracted laboratory to ensure the quality of data meets the projects needs and complies with project and regulatory requirements. Specific performance requirements (e.g. reporting limits, turnaround time, and sample delivery schedules) for the laboratory are included in the task specific QAPPs following coordination with the laboratory.

Measuring and testing equipment used in field and laboratory investigations not owned by GeoEngineers are acquired, as needed, to complete the specified scope of work. Equipment is checked upon receipt to ensure proper function and calibration prior to use.

6.0 DOCUMENTATION AND RECORDS

GeoEngineers maintains a rigorous internal QA/QC program that is applied to all field studies, data collection, data analysis, report preparation, laboratory analysis and design efforts. The application of the quality management procedures is managed by the Project Manager and the ultimate responsibility is allocated to the Principal or Associate in charge of the project. Our hard copy and electronic project files, including data and documents, are keyed, managed and archived by the project number. All electronic and hard copy files are maintained at the local office level. Electronic files from each office location are copied to our corporate data storage facility for data security and daily backup. In addition, all offices have ready access to all electronic project files on SharePoint through secure internet connections.

6.1. PROJECT RECORDS

Project records are defined as completed, legible documents, in hard copy and/or electronic format that furnish evidence of the satisfactory completion of the required contractual or task order-specific scope of work as well as the quality of the services or work products provided. Project records are maintained and organized in discrete project- and task order-specific files. Project

records are physically/electronically isolated from work in process or draft/working versions of documents and at a minimum include:

- As-submitted proposal(s), the approved Master Service Agreement, all Task Orders and any addenda or modifications thereto;
- Professional resumes for all staff assigned to the project;
- Purchase orders, subcontracts, and any modifications;
- Incoming and outgoing correspondence (including e-mail) that affects project scope, schedule, budget, or quality, or that addresses environmental or occupational health and safety issues associated with the project;
- Meeting attendance sheet(s) and minutes for client meetings;
- Draft and final deliverable work products, with transmittal forms;
- Field or laboratory test data, and measuring and test equipment calibration/maintenance records;
- Project specific chain of custody documents;
- Internal surveillance inspection and audit reports;
- Client audit documentation, as provided;
- Completed Corrective/Preventive Action Requests from any external or internal audits/surveillances; and
- Completed annual management review documentation.

Unless otherwise directed by the client or GeoEngineers' corporate counsel, records are retained for a period of 10 years, after which they may be archived or (if specifically authorized by the client or corporate counsel) destroyed.

6.2. PROJECT DOCUMENTS

The development, review and circulation of written deliverables are documented using a "Correspondence Checklist" (CCL). The CCL documents: 1) senior level review and approval of the deliverable; 2) file numbers for hard copy and electronic filing and archiving; 3) a review check-off list for all components of the document; 4) distribution method (PDF, email, fax, mail, etc.); and 5) a final Quality Control Checklist.

The QA/QC steps for deliverable production are as follows:

- All sections of the CCL are completed (whether draft or final).
- The different people who review a report initial in the corresponding section (e.g., Principal or Project Manager review). Sections that do not apply are crossed out.
- In accordance with GeoEngineers' Policy on Signatory Authority, Principal/Associate review/approval is required and the Principal/Associate providing that review initials the CCL.
- All the necessary signatures are obtained before the report is sent out.

- The Table of Contents (if used) is checked to make sure the document headings, tables, figures and appendices correspond with the Table of Contents.
- To reduce the risk that the wrong, figures, analytical data or other appendix data are used, the Project Manager or Project Coordinator collects the figures, data and appendices and verifies that they are correct and provides them for quality control check with the rest of the report before final copy or PDF production.
- A Quality Control Checklist is used by the Project Manager and Project Coordinators to ensure that the document is complete and ready to go.
- The Project Coordinator completes a final QA/QC on the report before copying and alerts the Project Manager of any problems there may be with the report.
- After the QA/QC process, the report is copied, collated and bound (if necessary). A hard copy is placed in our Originals filing. A scanned copy is placed in the SharePoint Client folder.

7.0 COMPUTER HARDWARE AND SOFTWARE

The quality of hardware and software used by GeoEngineers is addressed in Information Technologies (IT) policies and guidance, which can be accessed through GeoEngineers' Intranet. GeoEngineers "Acceptable Use Policy" outlines the acceptable use of computer equipment and communications at GeoEngineers. These rules are in place to protect the employee and GeoEngineers to minimize the risks of virus attacks, compromising of network systems and services, and legal issues. Effective security is a team effort involving the participation and support of every GeoEngineers employee and affiliate who deals with information and/or information systems. Internet/Intranet/Extranet-related systems, including but not limited to computer equipment, software, operating systems, storage media, network accounts providing electronic mail, World Wide Web browsing, and FTP, are the property of GeoEngineers. These systems are to be used for business purposes in serving the interests of the company, and of our clients and customers in the course of normal operations.

Specific policies on or related to the quality of computer hardware and software are posted under Information Technology on GeoEngineers' Intranet.

8.0 PLANNING

To ensure delivery of high-quality work products and services, GeoEngineers utilizes the general concepts outlined in the EPA Data Quality Objectives (DQO) Process to: 1) evaluate the problem; 2) identify the goals of the project; 3) identify information inputs; 4) define the project boundaries; 5) develop an analytic approach; 6) specify performance criteria; 7) develop a plan for obtaining data; and 8) utilizing data obtained to set project specific goals. The DQO process enables the project manager, in coordination with the QA leader, to set performance or acceptance criteria for environmental data.

Documentation of field sampling data will be reviewed for conformance with project QC requirements described in site specific QAPPs. At a minimum, field documentation will be checked for proper documentation of the following:

- Sample collection information (i.e., date, time, location, matrices, etc.);
- Field instruments used and calibration data;
- Sample collection protocol;
- Sample containers, preservation, and volume;
- Field QC samples collected at the frequency specified;
- COC protocols; and
- Sample shipment information.

Sample receipt forms provided by the laboratory will be reviewed for QC exceptions. The final laboratory data package will describe (in the case narrative) the effects that any identified QC exceptions have on data quality. The laboratory will review transcribed sample collection and receipt information for correctness prior to delivering the final data package.

GeoEngineers evaluates specific task order requirements, and prepares appropriately detailed plans or instructions that address the project's scope of work; budgets and schedule; milestones, health and safety requirements, daily tailgate meeting requirements for field work; technical requirements and specific quality standards for field studies and laboratory testing; data analysis and report preparation; and other guidance as necessary to ensure acceptable and defensible quality in the work performed.

9.0 IMPLEMENTATION OF WORK PROCESSES

The Principal-In-Charge oversees the implementation of work process. To ensure that the collection of environmental data is of sufficient quality to meet project goals in a safe efficient manner and Technical/Field Staff are provided the following:

- All available information necessary to properly execute the work;
- Specific instructions for performing the work, with a level of detail commensurate with the nature of the work and the experience of the workforce;
- Descriptions of necessary material, equipment, and monitoring/measurement devices;
- Applicable quality procedure, technical procedure or other processes for monitoring and measurement of work product and service quality (including requirements for performing technical reviews on all draft and final deliverable work products; and
- Other information, as required, to fulfill the requirements of the scope of work.

Subcontracted analytical laboratories are responsible for following appropriate QA and QC procedures for handling and/or analyzing collected samples and reviewing analytical results to ensure that the QC requirements have been met.

10.0 ASSESSMENT AND RESPONSE

The effectiveness of the quality system is evaluated at a minimum on an annual basis using quality system audits, technical reviews, performance evaluations data quality assessments, technical system audits and surveillance. All field or laboratory activities conducted for GeoEngineers are evaluated using the methods described in Section 8.0 to determine whether data collection activities are implemented as planned and that the data are of the right type, quality, and quantity to support their intended use. The Principal-In-Charge is ultimately responsible for assuring that data quality assessment is done for each project that involves environmental data.

Appropriate corrective and preventative actions will be taken to eliminate the cause of a detected non-conformance or other undesirable situation directly observed, observed during inspections or from internal audits.

11.0 QUALITY IMPROVEMENT

The Project Manager in conjunction with the Principal-in-Charge is responsible for identifying, planning, implementing and evaluating the effectiveness of the quality improvement methods for individual projects. The quality improvement is achieved by assessing the effectiveness of the processes for collection and use of project related data, and by taking preventive and corrective actions to improve those processes. The preventative and corrective actions help ensure that conditions adversely impacting project quality are prevented or identified promptly, including determining the nature and extent of the problem, and corrected as soon as possible. Individual responsibilities, lines of authority and communication for the key positions providing QA and QC are described in Section 2.0. GeoEngineers follows a process for continuous improvement. During this process we are evaluating every step.

- Identify the potential problem – A problem that can negatively impact project quality can be identified by any employee or individual on the project team. Once a problem is identified the Project Manager is contacted. The Project Manager will determine other team members that need to be involved in the corrective action and will work with other project team members to generate solution through design.
- Implement the design solution – The Project Manager will incorporate the design solution into project related documents and communicate those changes to other project team members impacted by the change.
- Monitor the design solution – The Project Manager will monitor implementation and evaluate the implemented design solution.
- Adjust the design solution if necessary – The Project Manager will identify areas for improvement and make changes, if needed based on observations made during the Monitoring of the design solution step.

The Principal Business Unit Leader is ultimately responsible for the evaluation of quality improvement effectiveness within their region.

12.0 REFERENCES

~~United States Environmental Protection Agency (EPA), "EPA Requirements for Quality Management Plans, EPA QA/R-2," United States Environmental Protection Agency Office of Environmental Information, Publication EPA/240/B-01/002, dated March 2001.~~

American National Standards Institute/American Society for Quality (ANSI/ASQ), "Quality systems for Environmental data and Technology Programs – Requirements with Guidance for Use," Publication ANSI/ASQ E4-2004, dated 2004.

GeoEngineers, Inc., "Draft Work Plan, Avery Landing Site, Avery Idaho," GEI File No. 2315-016-02, prepared for U.S. Environmental Protection Agency on Behalf of Potlatch Land and Lumber, dated April 12, 2013.

~~U.S. United States Environmental Protection Agency (USEPA). "USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Superfund Data Review," EPA 540-R-04-004, Office of Superfund Remediation and Technology Office of Emergency and Remedial Response Innovation, US Environmental Protection Agency, Washington, DC, dated October 201004.~~

~~U.S. United States Environmental Protection Agency (USEPA). "Guidance for Labeling Externally Validated Laboratory Analytical Data for Superfund Use," EPA 540-R-08-005, Office of Solid Waste and Emergency Response, US Environmental Protection Agency, Washington, DC, dated January 2009.~~

~~United States Environmental Protection Agency (EPA). "USEPA Contract Laboratory Program National Functional Guidelines for Superfund Organic Methods Data Review," EPA 540-R-08-01, Office of Superfund Remediation and Technology Innovation, US Environmental Protection Agency, Washington, DC, dated June 2008.~~

~~United States Environmental Protection Agency (EPA), "EPA Requirements for Quality Management Plans, EPA QA/R-2," United States Environmental Protection Agency Office of Environmental Information, Publication EPA/240/B-01/002, dated March 2001.~~

Commented [EL1]: Not clear why this reference is included in the QMP.

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Commented [EL3]: Not clear why this reference is included in the QMP.

Commented [PL4]: Reference is cited in Section 3.0, last paragraph as it relates to validation of data. Reference modified to cite "EPA"

Commented [PL5]: Added reference for organic data review/validation. Cited in Section 3.0.



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